

## Adopted Policy: Special Enrollment Period in Response to Outbreak of COVID-19

### Issue

On February 29, 2020 Governor Jay Inslee declared a state of emergency in Washington in response to the outbreak of COVID-19, also known as Coronavirus. The declaration of a state of emergency came after the first case of Coronavirus detected in the United States was confirmed in Washington on January 21 and the death of an individual confirmed with the virus on February 28. Since that time, the state has confirmed the deaths of at least 18 individuals related to Coronavirus. Additionally, the state has confirmed at least 136 cases and nearly 250 individuals under observation and quarantined based on travel patterns or exposure to high risk areas.

The Washington State Department of Health has indicated the state lab is able to test for and receive results within a day in response to increasing risk of infection across Washington State. The Department has indicated there is the potential for increased demand on healthcare systems as the outbreak continues. Individuals who may experience symptoms of a COVID-19 infection are likely to desire testing services, which are costly. For individuals who require further care, the expenses will increase and be compounded by the requirement of quarantine which may result in lost wages.

Washingtonians who are uninsured are at risk of deferring testing for Coronavirus due to the cost, which under insurance may be available free or at a reduced cost. Individuals deferring testing may be susceptible to spreading the illness and suffering greater health impacts from not receiving treatment early on. The Washington State Department of Health, Office of the Insurance Commissioner, Health Care Authority, health insurance carriers, and other public and private entities have already begun taking steps to minimize the potential negative impact of COVID-19 on individuals in Washington State.

### Policy

In response to the public health state of emergency that has been declared in Washington State, the Exchange should open a limited-time special enrollment period for qualified individuals who are currently uninsured to have the opportunity to enroll in coverage through *Washington Healthplanfinder*. The special enrollment period would be available for 30 days, from March 10 through April 8, 2020. The Exchange may re-evaluate the end date of the special enrollment period if the state of emergency remains in effect after April 8, 2020.

During this 30-day period, consumers would be able to request an SEP and enroll in a plan with a coverage start date of April 1, 2020. Any consumer who intends to utilize this SEP must select a plan by April 8. Granting this enrollment period is consistent with the Exchange's Exceptional Circumstances SEP policy and federal regulations (45 CFR § 155.420(d)(9)), which allow for a special enrollment period when an individual meets other exceptional circumstances as the Exchange provides.

## Implementation Process

1. WAHBE will update its corporate website and perform outreach to inform consumers of the special enrollment opportunity and that they may be eligible to enroll in Exchange coverage.
2. This enrollment opportunity will not be available by self-service through *Washington Healthplanfinder*.
3. To utilize this SEP, a consumer should contact the *Washington Healthplanfinder* Call Center or a navigator or broker, attest that they are uninsured, and request to enroll in coverage with a coverage effective date of April 1, 2020.
4. Call Center Representative (CSR) or navigator, broker, or in-person assister will log a ticket and route to WAHBE staff.
5. WAHBE staff open SEPs daily with an end date of April 8 and trigger a correspondence to the consumer notifying them to select a plan by April 8, 2020.
6. Customer selects a plan between March 10 and April 8 with a coverage effective date of April 1, 2020.

## Leadership Action

**Adopted:** Adopted by Executive Leadership Team on March 9, 2020